

FILED
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2000 SEP -6 A 10: 51

PATRICE G. BURLEY

Plaintiff

*
CLERK'S OFFICE
AT BALTIMORE

BY _____ * DEPUTY

vs.

*

Civil Action No. JFM 00-1280

BALTIMORE CITY'S DEPARTMENT *
OF PUBLIC WORKS -
ENVIRONMENTAL SERVICES *
DIVISION, et al

*

Defendants

*

CONSENT MOTION FOR EXTENSION OF TEMPORARY STAY

Patrice G. Burley, Plaintiff, by her undersigned counsel and Defendants Baltimore City Department of Public Works, Environmental Services Division, Ralph O. Cullison, III and William Stack, by their undersigned counsel, pursuant to Local Rule 105.9, do hereby file this Consent Motion for Extension of Temporary Stay, and for reasons state:

1. Plaintiff originally filed a pro se Complaint alleging employment discrimination against Defendants on or about May 2, 2000. The Defendants responded to Plaintiff's pro se Complaint by filing a Motion to Dismiss on or about June 30, 2000.

2. Plaintiff filed a pro se response to Defendants' Motion to Dismiss on July 14, 2000.

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3. Counsel, Christopher M. Erwin, was appointed to represent the Plaintiff on July 26, 2000 and received copies of pleadings in the subject action on or about August 1, 2000.

4. Counsel for the Plaintiff had the opportunity to obtain documentation from the Plaintiff related to her alleged claims and has met with the Plaintiff on Monday, August 28, 2000. Based upon a review of Plaintiff's documents, the Plaintiff's counsel has been provided incomplete documentation related to her prior claims made with the Baltimore Community Relations Commission, the Equal Employment Opportunity Commission and the State of Maryland Commission on Human Relations.

5. The Plaintiff's Counsel is unable at the present time to prepare any amendment to the pleadings filed to date on behalf of the Plaintiff and/or to serve responsive pleadings to papers filed by the Defendants until such time as Plaintiff's counsel has received a complete record of the prior claims of discrimination made with the Equal Employment Opportunity Commission, the State of Maryland Commission on Human Relations and/or the Baltimore Community Relations Commission.

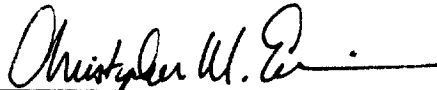
6. The Plaintiff's counsel has made a request of these agencies for copies of any and all filings made on behalf of the Plaintiff as well as the disposition, if any, on said claims as evidenced by Plaintiff's counsel's letters attached collectively as Motion Exhibit 1.

7. Plaintiff requests an extension of the Temporary Stay of the above-captioned action until October 2, 2000.

8. Plaintiff's counsel has contacted and spoke with counsel for the Defendants, Allyson M. Huey, Esquire, who has agreed to extend the temporary stay in the above-captioned action until October 2, 2000.

WHEREFORE, Plaintiff and Defendants jointly request that this Honorable Court enter an order extending the temporary stay of proceedings in the above-captioned action until October 2, 2000.

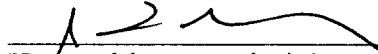
Respectfully submitted,



Christopher M. Erwin
Fed. Bar No. 11748
Lord & Whip, P.A.
800 One Center Plaza
120 W. Fayette Street
Baltimore, MD 21201
(410) 539-5881
Attorneys for Plaintiff

Allyson M. Huey
Fed. Bar No. 025065
Assistant Solicitor
Baltimore City Office of Law
129 City Hall
100 N. Holliday Street
Baltimore, MD 21202

SO ORDERED:



Honorable J. Frederick Motz, United States
District Court